

REMARKS

The Applicants respectfully request reconsideration of this application in view of the above amendments and the following remarks.

35 U.S.C. §102(e) Rejection – Poisner '669

The Examiner has rejected claims 10-17 and 27 under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 7,076,669 issued to Poisner et al. (hereinafter "Poisner '669"). The Applicants respectfully submit that the present claims are allowable over Poisner '669.

Claim 10 pertains to:

"A method, comprising:

monitoring for communication of trusted data cycles on a bus with a secured docking logic of a computer system, the secured docking logic coupled between the bus and a docking connector;

detecting each of the trusted data cycles by detecting a predefined trusted data cycle indicator with the secured docking logic; and

preventing the trusted data cycles from being available to a component external to the computer system with the secured docking logic".

The Applicants respectfully submit that Poisner '669 does not disclose these limitations. In particular, Poisner '669 does not disclose monitoring for communication of trusted data cycles on a bus with a secured docking logic that is coupled between the bus and a docking connector; detecting each of the trusted data cycles with the secured docking logic; and preventing the trusted data cycles from being available to a component external to the computer system with the secured docking logic, in combination with the other claim limitations.

Poisner '669 discusses a method and apparatus for communicating securely with a token. See e.g., the Title. Poisner '669 discusses that I/O bus interface (I/F) logic 105 couples chipset 120 to token 155 using an I/O bus 162. See e.g. column 3, lines 45-46. Notice from FIG. 1 that the

I/O bus I/F logic 105 is part of the chipset. At column 5, lines 6-13, Poisner '669 discusses that the I/O bus I/F logic 105 also generates a token cycle to the token 155. It is further discussed that the token cycle to the token 155 is not to appear on or is to be suppressed on one or more other buses other than the I/O bus 162.

However, Applicants respectfully submit that this I/O bus I/F logic 105 is part of the **chipset**. See e.g., I/O bus I/F logic 105 shown in FIG. 1. In contrast, claim 10 clearly recites that the claimed monitoring, detecting, and preventing operations are performed with the **secured docking logic** and that the **secured docking logic coupled between the bus and a docking connector**.

Anticipation under 35 U.S.C. Section 102 requires every element of the claimed invention be identically shown in a single prior art reference. The Federal Circuit has indicated that the standard for measuring lack of novelty by anticipation is strict identity. *"For a prior art reference to anticipate in terms of 35 U.S.C. Section 102, every element (emphasis added) of the claimed invention must be identically (emphasis added) shown in a single reference."* In Re Bond, 910 F.2d 831, 15 USPQ.2d 1566 (Fed. Cir. 1990).

For at least one or more of these reasons, claim 10 and its dependent claims are believed to be allowable over Poisner '669.

35 U.S.C. §103(a) Rejection – Poisner '669, Krancher

The Examiner has rejected claims 1-7, 9, 23-24 and 26 under 35 U.S.C. §103(a) as being unpatentable over Poisner '669 in view of U.S. Patent No. 6,799,237 issued to Krancher et al. (hereinafter "Krancher"). Without admitting that these references may be combined, the Applicants respectfully submit that the present claims are allowable over Poisner '669 and Krancher.

Claim 1 pertains to:

App. No. 10/643,678
BEV/wlr

- 8 -

Dkt. No. 42P16632

"A computer system, comprising:

a chipset;

an internal component of the computer system;

a bus coupled to the chipset to communicate a trusted data cycle to the internal component of the computer system;

a docking connector; and

a secured docking circuit coupled to the bus and coupled between the bus and the docking connector to scan for the trusted data cycle, detect the trusted data cycle, and provide a filtering mechanism to prevent the trusted data cycle from being provided to a device external to the computer system through the docking connector".

The Applicants respectfully submit that Poisner '669 and Krancher do not disclose these limitations or render them obvious. In particular, Poisner '669 and Krancher do not disclose or render obvious the claimed secured docking circuit coupled between the bus and the docking connector to scan for the trusted data cycle, detect the trusted data cycle, and provide a filtering mechanism to prevent the trusted data cycle from being provided to a device external to the computer system through the docking connector, in combination with the other claim limitations.

Poisner '669 does not disclose the claimed secured docking circuit. In particular, the I/O bus I/F logic 105 of Poisner '669 is part of the chipset and is not the claimed secured docking circuit coupled between the bus and the docking connector. The discussion above is pertinent to this point.

Applicants respectfully submit that Krancher does not remedy all of what is missing from Poisner '669. Krancher pertains to identifying and synchronizing incompatibilities between a portable computer and a docking station. See e.g., the Title. As discussed at column 2, lines 15-19, damage and limited functionality may result in the event of incompatibilities or when software updates are needed. As discussed at column 2, lines 20-26, *"What is needed in the art is an inexpensive and reliable mechanism to insure that each notebook and docking station are compatible before allowing a complete electrical docking (emphasis added). What is further*

needed in the art is a mechanism or method that determines whether functionality (emphasis added) may be lost between a docking station and a notebook, and notifying the computer user of that inadequacy”.

FIG. 1 shows quick switches 86 that are used to couple the portable computer and the docking station when they are sufficiently compatible, or de-couple the portable computer and the docking station when they are not sufficiently compatible. See e.g., column 5, lines 47-57. The type of compatibility is discussed further in conjunction with FIG. 3 of Krancher. As discussed at column 6, lines 40-44, “software executed in the notebook computer 200 makes an initial determination as to whether the notebook is compatible with the docking station based on the information that represent a products code of the docking station (block 22)”. As discussed at column 6, lines 48-52, “If the two devices are incompatible, the decision process ends and the quick switches 80 for the PCI bus are not closed (blocks 24 and 36). Thus, the notebook computer operates stand alone (not docked to the docking station) or boots up in a stand-alone mode”. As discussed at column 6, lines 52-57, “If, however, the docking station and the notebook computer are compatible, the notebook software next determines whether the ROM date is sufficiently new to enable at least minimum functionality between the notebook 200 and the docking station 300 (block 26)”.

Accordingly, Krancher discusses that compatibility is used to decide whether or not to electrically couple the buses of the notebook and docking station.

Accordingly, applicants respectfully submit that Krancher pertains to **compatibility not trust**. The quick switches are closed or not closed based on **compatibility** and ensuring that “at least minimum functionality” is achieved, **not based on trust**. Furthermore, if there is incompatibility, the buses of the notebook and the docking station are **not coupled**, which is different than filtering trusted cycles when the docking station and external device are coupled.

In addition, there is no teaching or suggestion in Krancher of a circuit to scan for a trusted data cycle, detect the trusted data cycle, and provide a filtering mechanism to prevent a device external to the computer system from accessing the trusted data cycle. There simply is no mention whatsoever of scanning for a trusted cycle, detecting the trusted cycle, and of implementing a filtering mechanism to prevent a device external to the computer system from accessing the trusted data cycle.

Still further, the Examiner's stated motivation for combining Poisner '669 and Krancher of "to increase functionality of the coupled units" (see e.g., page 4 of the present Office Action) is not believed to be adequate motivation for modifying these references to meet the claimed limitations pertaining to the claimed filtering of the claimed trusted data cycles.

For at least one or more of these reasons, claim 1 and its dependent claims are believed to be allowable over Poisner '669 and Krancher.

Independent claims 7 and its dependent claims are believed to be allowable for one or more similar reasons.

35 U.S.C. §103(a) Rejection – Poisner '669, Poisner '143

The Examiner has rejected claims 18 and 19 under 35 U.S.C. §103(a) as being unpatentable over Poisner '669 in view of Poisner '143.

As discussed above, independent claim 10, from which dependent claims 18 and 19 depend, is believed to be allowable over Poisner '669. As understood by Applicants, Poisner '143 does not remedy all of what is missing from Poisner '669, and the Examiner has not relied upon Poisner '143 for disclosing what is missing. Accordingly, claim 10 and its dependent claims, including claims 18 and 19, are believed to be allowable over Poisner '669 in view of Poisner '143. Applicants elect at this point not to address other aspects of the rejection of these dependent claims, including whether or not these references should be combined.

35 U.S.C. §103(a) Rejection – Poisner '669, Poisner '143, Probst

The Examiner has rejected claims 20-22 under 35 U.S.C. §103(a) as being unpatentable over Poisner '669 in view of Poisner '143 and in view of U.S. Patent No. 5,982,899 issued to Probst (hereinafter "Probst").

As discussed above, independent claim 10, from which dependent claims 20 and 22 depend, is believed to be allowable over Poisner '669 and Poisner '143. As understood by Applicants, Probst does not remedy all of what is missing from Poisner '669 and Poisner '143, and the Examiner has not relied upon Probst for disclosing what is missing. Accordingly, claim 10 and its dependent claims, including claims 20 and 22, are believed to be allowable over Poisner '669, Poisner '143, and Probst. Applicants elect at this point not to address other aspects of the rejection of these dependent claims, including whether or not these references should be combined.

35 U.S.C. §103(a) Rejection – Poisner '669, Krancher, Yanagisawa

The Examiner has rejected claim 25 under 35 U.S.C. §103(a) as being unpatentable over Poisner '669 in view of Krancher and in view of U.S. Patent No. 6,519,669 issued to Yanagisawa (hereinafter "Yanagisawa").

As discussed above, independent claim 1, from which dependent claim 25 depends, is believed to be allowable over Poisner '669 and Krancher. As understood by Applicants, Yanagisawa does not remedy all of what is missing from Poisner '669 and Krancher. Accordingly, claim 1 and its dependent claims, including claim 25, are believed to be allowable over Poisner '669, Krancher, and Yanagisawa. Applicants elect at this point not to address other aspects of the rejection of these dependent claims, including whether or not these references should be combined.

Conclusion

In view of the foregoing, it is believed that all claims now pending patentably define the subject invention over the cited art of record and are in condition for allowance. Applicants respectfully request that the rejections be withdrawn and the claims be allowed at the earliest possible date.

Request For Telephone Interview

The Examiner is invited to call Brent E. Vecchia at (303) 740-1980 if there remains any issue with allowance of the case.

Request For An Extension Of Time

The Applicants respectfully petition for an extension of time to respond to the outstanding Office Action pursuant to 37 C.F.R. § 1.136(a) should one be necessary. Please charge our Deposit Account No. 02-2666 to cover the necessary fee under 37 C.F.R. § 1.17 for such an extension.

Charge Our Deposit Account

Please charge any shortage to our Deposit Account No. 02-2666.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

Dated: 4/23/08

By Brent E. Vecchia
Brent E. Vecchia, Reg. No. 48,011
Tel.: (303) 740-1980 (Mountain Time)

1279 Oakmead Parkway
Sunnyvale, California 94085-4040